

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-361-G

In the Matter of:)	
)	
Application of Dominion Energy)	
South Carolina, Incorporated for the)	
Approval of New Natural Gas)	
Energy Efficiency Programs and)	PETITION TO INTERVENE
Notice of Intent to Seek Net Lost)	
Revenue under the Natural Gas Rate)	
Stabilization Act (Application Does)	
Not Include a Request for a Rate)	
Increase))	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”), through counsel, hereby petition the South Carolina Public Service Commission (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules. In support of this petition, Petitioners state as follows:

1. On February 23, 2021, Dominion Energy South Carolina, Inc. (“DESC” or “Company”) filed an application seeking approval of four energy efficiency (“EE”) programs for the Company’s residential and commercial natural gas customers. DESC requests that the Commission approve each program, in addition to granting the Company the authority to 1) modify any of the proposed programs without Commission approval; 2) create a new Rider to Retail Gas Rates for recovery of program costs and the 9.9% shared savings incentive.

2. DESC's application serves as a notice of intent to recover net lost revenues resulting from the proposed EE programs in the annual Natural Gas Rate Stabilization proceeding under S.C. Code Ann. § 58-5-400, *et seq.*, through which the Company may seek adjustments to its natural gas rate schedules and tariffs.

3. With this application, DESC seeks to create a portfolio of cost-effective gas EE programs so that gas customers can obtain the same benefits currently available to electric customers. As a result, each of the proposed programs are modeled on existing programs available to DESC's residential and commercial electric customers and utilize administrative systems already in place for the electric EE programs. The programs include the 1) Energy Wise Savings Store; 2) Residential High Efficiency Gas Equipment Program; 3) Commercial High Efficiency Gas Equipment Program; and 4) Neighborhood Energy Efficiency Program.

4. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. As an advocate for demand side management and energy efficiency, CCL and its members support the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL was a party to Docket No. 2009-261-E, and to the settlement agreement adopted and approved by the Commission in Order No. 2010-472, in which the Commission approved DESC's initial EE programs for electric customers. CCL also has members in South Carolina who receive natural gas service from DESC and would be eligible to reduce their gas bills through DESC's proposed programs. The principal address of CCL is 131 Spring St., Charleston, South Carolina 29403.

5. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout

the Southeast. SACE and its members are interested in promoting greater reliance on demand side management and energy efficiency to meet South Carolina's energy needs. SACE has members who receive natural gas service from DESC and would be eligible to reduce their gas bills through DESC's proposed programs. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

6. Petitioners have participated in numerous dockets relating to DESC's DSM programs for electric customers, including annual update dockets (CCL participated in Docket Nos. 2011-49-E, 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, 2018-42-E, and 2019-239-E; SACE participated in Docket Nos. 2012-55-E, 2013-50-E, 2014-44-E, 2015-45-E, 2016-40-E, 2017-35-E, 2018-42-E, and 2019-239-E) and Docket No. 2013-208-E, in which DESC's current cost-recovery and incentive mechanism was established. Petitioners also participate in the DESC DSM advisory group process established in Docket No. 2009-261-E.

7. Petitioners seek to intervene in this proceeding to advocate for their members' interests in reducing fossil fuel consumption and demand through cost-effective EE initiatives. Participation in this proceeding is aimed at supporting clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

8. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 4th day of March, 2022.

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Counsel for Petitioners

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* on behalf of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 4th day of March, 2022.

s/Kate Mixson